

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF NEW YORK

**NOTICE OF MOTION FOR
PROTECTIVE ORDER**

In Re:

JOHN C. SZUMOWSKI

Debtor.

Case No.: 10-12431-rel
(Chapter 13)

Assigned to:
Hon. Robert E. Littlefield, Jr.
Chief Bankruptcy Judge

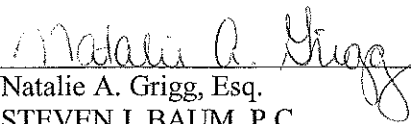
Please take notice that BAC Home Loans Servicing, LP (BAC), a secured creditor of Debtor, by the undersigned attorneys, will move this Court on the 26th day of May 2011 at 9:15 a.m. or as soon thereafter as counsel can be heard, at the United States Bankruptcy Court, 445 Broadway Suite 327, Albany, NY 12207 for a Protective Order pursuant to Section 107(b) of the Bankruptcy Code and Rules 7026(c) and 9018 of the Federal Rules of Bankruptcy Procedure and for such other relief as the Court may deem proper.

PURSUANT TO BANKRUPTCY RULE 9014 AND LOCAL RULE 9013.1(c), IF YOU INTEND TO OPPOSE THE MOTION, YOU MUST SERVE ON THE MOVANT'S COUNSEL AND FILE WITH THE CLERK OF THE BANKRUPTCY COURT, WRITTEN OPPOSITION TO THE MOTION NOT LATER THAN SEVEN (7) DAYS PRIOR TO THE RETURN DATE OF THIS MOTION. IN THE EVENT NO WRITTEN OPPOSITION IS SERVED AND FILED, NO HEARING ON THE MOTION WILL BE HELD BEFORE THE COURT ON THE RETURN DATE AND THE COURT WILL CONSIDER THE MOTION AS UNOPPOSED.

DATED: April 19, 2011
Amherst, New York

Yours, etc.

By:


Natalie A. Grigg, Esq.
STEVEN J. BAUM, P.C.
Attorneys for Secured Creditor
BAC Home Loans Servicing, LP
Office and Post Address:
220 Northpointe Parkway, Suite G

Amherst, NY 14228
Telephone 716-204-2400

TO:

JOHN C. SZUMOWSKI
2484 Ridge Rd
Schenectady, NY 12302-6740

Debtor

RONALD J. KIM, ESQ.
Law Offices of Ronald J. Kim
P.O. Box 318
Saratoga Springs, NY 12866

Attorney for Debtor

ANDREA E. CELLI, ESQ.
7 Southwoods Boulevard
Albany, NY 12211

Chapter 13 Trustee

Lisa Penpraze, Esq.
Office of The U.S. Trustee
74 Chapel Street
Suite 200
Albany, NY 12207

U.S. Trustee